**Amiad's ADI-P Privacy Policy**

*Last Revised: September 3, 2018*

Amiad Water Systems Ltd and its affiliates (“**Amiad**” or “**we**”) respects the privacy of its "ADI-P" mobile application users (the “**App**”, “**User**” or “**you**”) and is committed to protect its Users’ personal information. We believe that you have a right to know our practices regarding the information we may collect and use about you when you use the App. Please read the following carefully to understand Amiad’s views and practices regarding your personal information and how Amiad will treat it.

### **Table of Content**

1. About this Privacy Policy
2. Who we are
3. Your acknowledgment of this policy
4. How do we collect information about our Users?
5. What are the purposes of the collection and processing of information?
6. Sharing Personal Information with Third Parties
7. Your Rights
8. Location of Your Data
9. Minors
10. Third Party Service Providers and Third Party Software
11. Links to Third Party
12. Security
13. Data Retention
14. Changes to the Privacy Policy
15. Have any Questions?

### **About this Privacy Policy**

This Privacy Policy applies when you visit our App. It also applies where we are in contact with you in other ways whether in your capacity as an individual or as director, shareholder, partner, employee or other representative of a company or other organization.

### **Who we are**

In this policy, references to Amiad, or to "we" or "us" are to Amiad Water Systems Ltd., which is a registered company in the state of Israel (No. 512497694) at Kibbutz Amiad, Israel. Individuals wishing to contact us about data protection issues may do so by writing to us at the above address or by emailing us at [info@amiad.com](mailto:info@amiad.com).

### **Your acknowledgment of this policy**

This Privacy Policy (“**Privacy Policy**”) details how your Personal Information collected via the App is used and processed by Amiad.

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE APP, YOU ACKNOWLEDGE THAT YOU ARE OR HAVE HAD THE OPPORTUNITY TO BECOME AWARE OF AND AGREE (IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED) TO THIS PRIVACY POLICY AND AMIAD’S PRACTICES DESCRIBED THEREIN, INCLUDING THE PROCESSING (INCLUDING COLLECTING, USING, DISCLOSING, RETAINING OR DISPOSING) OF YOUR INFORMATION UNDER THE TERMS OF THIS POLICY.

### **Which information may we collect about Users?**

We collect from Users of our App, two types of data and information:

### **Non-personal Information**. The first type is non-identifiable and anonymous information. Non-personal Information, which is being gathered, consists of technical information and behavioral information that does not pertain to a specific individual (“**Non-Personal Information**”).

### You may access and browse the App without disclosing personal information, although, like most Apps, we passively collect certain Non-Personal Information from your devices, including: (i) technical information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc.; and (ii) behavioral information which may include the User’s click-stream on the App, the activities of the User on the App and additional information of a similar nature (collectively, “**Technical and Behavioral Information**”).

### **Personal Information**. The other type of information we collect is individually identifiable information. To put it simply, this information identifies an individual or is of a private and/or sensitive nature, such as your contact information (“**Personal Information**”), including:

### **Personal Information which is provided voluntarily**:

* + - * Communications with Amiad: Personal Information you provide us as part of any communications with Amiad, by any means, including by approaching our customer services, responding to surveys or during sales calls (such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences).
      * Activating the App: During the App's activation process, you will be required to provide us with certain Personal Information, including your name, email, name of your company, name of ADI-P controller site and email address.
      * Use of the App: any other Personal Information you voluntarily upload to the App, including photos.

### **Personal Information collected via technology**:

* + - * Geolocation data: while using the App we will access, collect, process, monitor and/or remotely store "geolocation data", including through the collection of GPS coordinates to determine your location, in order to provide you our service, and for analytics and security purposes.
      * Data collected from the ADI-P controller: while using the App, information relating to the operation of your ADI-P controller will be collected from the ADI-P controller linked with the App, in order to provide you with our services offered via the App. Please note that any information collected from the ADI-P controller is stored locally on your mobile device and is not transmitted to Amiad or to any third party, unless you, at your discretion, export the data from the App via email. **You may export the information collected from the ADI-P controller to Amiad, together with your contact information, and we will use such data in order to provide you with customer support and in order to perform analytics. Please note that any export of information from the App to any third party is entirely at your own risk.**
      * Technical and Behavioral Information: to the extent that the Technical and Behavioral Information detailed above under Section 3.1 will be linked to or associated with a specific individual then such information will be considered as Personal Information.

### Please note:

* + - * We may cross-reference Personal Information with other Personal Information we have about you and any Non-personal Information connected or linked to or associated with any Personal Information shall be deemed as Personal Information as long as such connection, linkage or association exists.

### **How do we collect information about our Users?**

There are two main methods we use to collect information:

### **We collect information through your entry, connection, access and/or use of the App.** In other words, when you access or use the App we are aware of your usage of the App, and may gather, collect and record the information relating to such usage. For example, when you use the App, we gather your Technical and Behavioral Information.

### **We collect information which you provide us voluntarily**. For example, we collect Personal Information that you provide via the Contact Form on our App. We will inform you prior to collecting your Personal Information if it is requested on a voluntary basis and the consequences of not providing voluntary Personal Information.

### **What are the purposes of the collection and processing of information?**

### Non-personal Information is processed in order to:

* + - * Enhance the User’s experience on the App;
      * Create statistical information and learn about the preferences of Users and general trends on the App (e.g. understand which features are more popular than others); and
      * Keep the App safe and secured and for prevention of fraud.

### Personal Information is processed in order to:

* + - * Enable the operation of the App and administer your Account;
      * Respond to you inquires, including the provision of customer service and handling malfunctions of the ADI-P controller;
      * Send you by email or through web-browser notification or through the post updates, notices, surveys, announcements, and additional information related to Amiad including with respect to changes made to our App' terms of use and privacy policy;
      * Add your contact details to our mailing list for the purposes of sending you information about our products and services by email, through web-browser notification or through the post. You have the right to opt-out of marketing messages at any time by following the instructions in such message or by contacting us at: info@amiad.com. For email marketing to an individual subscriber (that is, a non-corporate email address) with whom we have not previously engaged as a client, we may need your consent to send you unsolicited email marketing;
      * Personalize your experience on the App;
      * Ensure that content on the App is presented in an optimal way for you and for your device (e.g. tablet, mobile phone);
      * Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes;
      * Keep the App safe and secured and for prevention of fraud and crime;
      * Comply with our legal obligations and in order to be able to protect our rights and legitimate interests, including in order to improve the App;
      * Maintain our data processing records and general administrative purposes;

|  |
| --- |
| **Note to our Users in the EU**:  In order for Amiad to process your Personal Information, as detailed herein, such processing must be justified by a "basis" for processing. Please note that the Personal Information processing activities detailed herein may be justified on the basis that:   * the processing is based on your consent - where you provide us with your consent to contact you for marketing purposes, you will be asked to consent to such activities before we can process such information. If you choose not to give us your consent for such processing activities, or if you decide later to remove your consent, this may affect our ability to provide you with Amiad's marketing materials; * the processing is necessary for performance of a contract - generally your Personal Information will be provided to us because you are interested in using the App in accordance with the App's Terms of Use available at http://amiad.com/ADI-P\_Terms-Conditions\_300418.html or in order to receive certain services from Amiad, such as customer support, in accordance with your services agreement with Amiad. As such, we rely on this basis for processing activities that are required in order to enable you to use the App, to provide our service pursuant to your service agreement with Amiad and to let you know of changes to our App' terms of use and privacy policy; * the processing is necessary to comply with a legal obligation - we may process your Personal Information for disclosure of information to authorities; and * the processing is in our legitimate commercial interests - subject to your interests and fundamental rights, under our legitimate interest in marketing our products and services via the App and offering the public comfortable and safe access to our App, we shall perform the Personal Information processing activities described herein, such as the processing of your Personal Information in order to personalize the App, assisting us to prevent crime and fraud, manage our internal operations and maintaining. Where we rely on legitimate interests as a lawful basis, we carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests.   **Note to non-EU Users**:  BY ENTERING, CONNECTING TO, ACCESSING OR USING THE APP, YOU CONSENT TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION AS SPECIFIED HEREIN. |

### **Sharing Personal Information with Third Parties**

### Amiad respects your privacy and will not disclose, share, rent, or sell your Personal Information to any third party, other than as permitted under this Privacy Policy.

### In addition to using the information collected by us for the purposes described under Section 6 above, we may also share your information in the following cases:

* + - * Amiad Personnel: Personal Information that we collect and process may be transferred to or accessed by personnel of Amiad for the sole purpose of enabling the operation of the App and to contact you (as detailed in Section 6 above). Please note that all Amiad personnel that will have access to your Personal Information are under an obligation of strict confidentiality with respect to such Personal Information.
      * Group Companies: the Personal Information you provide to us may be accessed by members of our group of companies in order to fulfill the purposes detailed herein.
      * Local Distributors and Sales Representatives: When you provide us with your contact details via the App or make certain requests for information about Amiad products or services, we may transfer your name and contact information to the local distributor, dealer or sales representative of Amiad products and services that is located close to your location, solely in order to enable us to respond to your request. We identify the nearest distributor, dealer or sales representative using the location that you provided us. Please note that we instruct our local distributors, dealers and sales representatives to maintain appropriate data security safeguards in place and they are contractually restricted from using your Personal Information for any purpose other than in order to offer you Amiad's products and services, and/or in order to respond to any other specific request that Amiad has received from you. We note that such distributors, dealers and sales representatives may separately ask you to provide your name and contact information for other marketing activities. Any information that you may transfer to them directly will be used by them according to their privacy practices and Amiad will not be responsible for their use of such information.
      * Service Providers: we share Personal Information with vendors, commercial software providers, consultants and data processers who perform services on our behalf, including without limitation, companies that provide analysis, messaging services and services which host the App. Please note that we collect, hold and manage your Personal Information through a third party's cloud based services, as reasonable for business purposes, which may be located in countries outside of your jurisdiction. For more information regarding our Service Providers, please refer to Section 11 below.
      * In addition, we may share Personal Information in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy or any other agreement or terms of service between you and Amiad, and to defend against any claims or demands asserted against us by you or on your behalf; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to protect the rights, property, or personal safety of Amiad, its Users or the general public; and (e) when Amiad is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Amiad (while such acquired company or investor may be located in countries outside of your jurisdiction).

### For avoidance of doubt, Amiad may transfer and disclose **Non-personal Information** to third parties at its discretion including without limitation for statistical, analytical and research purposes and for customization, developing and improvement of our App.

### **Your Rights**

Amiad acknowledges you have the right to access and change the Personal Information we collect and process**. If you wish to access or to correct, amend, or delete Personal Information, please send us an email to:** info@amiad.com and we will respond within a reasonable timeframe, but in any event no later than permitted by applicable law.

|  |
| --- |
| **Note to our Users in the EU**:  We hereby inform you of the following rights (by virtue of EU law), in respect of your Personal Information:   * Right to access: you may have the right to request a review of your Personal Information held by Amiad. We may refuse to comply with your access request if the request is manifestly unfounded, excessive or repetitive in nature. * Right to rectification: if the Personal Information processed by Amiad is incorrect, incomplete or not processed in compliance with applicable law or this Privacy Policy, you may have the right to have your Personal Information rectified. * Right to erasure: under certain conditions, you may be entitled to require that Amiad will delete or "block" your Personal Information (e.g. if the continued processing of those data is not justified). * Right to portability: you may have the right to transfer your Personal Information between data controllers (i.e. to transfer your Personal Information to another entity). The right to data portability only applies where your Personal Information is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means. * Right to object to or withdraw consent: where that lawful basis for processing your Personal Information is either "public interest" or "legitimate interests", those lawful bases are not absolute, and you may have a right to object to such processing. Where you object on grounds of legitimate interest, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. If the processing of your Personal Information is based on your consent, you have the right to withdraw your consent to such processing at any time. * The right to restrict processing – under certain circumstances, you may have the right to object to the processing of your Personal Information due to your particular situation. * Right to lodge a complaint: you have the right to lodge a complaint before the relevant data protection authority or supervisory authority of your jurisdiction.   **To exercise these rights, where applicable, please contact us by sending an email to:** info@amiad.com |

### **Location of Your Data**

The information collected from you by Amiad, as detailed in this Privacy Policy, may be transferred to, and stored at, servers which may be located in countries outside of your jurisdiction and in a country that is not considered to offer an adequate level of protection under your local laws. It may also be processed by Amiad and its suppliers, service providers or partners' staff operating outside your country.

Amiad is committed to protecting your Personal Information and will take appropriate steps to ensure that your Personal Information is processed and stored securely and in accordance with applicable privacy laws, as detailed in this Privacy Policy. Such steps include putting in place data transfer agreements or ensuring our third-party service providers comply with Amiad's data transfer protection measures.

|  |
| --- |
| **Note to our Users in the EU**:  If you are located in the EU, you have a right to request further information regarding the data transfer mechanisms used by us with respect to data transfers to third countries.  In order to keep your Personal Information safe, we apply strict safeguards when transferring it outside of the EEA, which may include the following:   * Transferring your personal information to countries approved by the European Commission as having adequate data protection laws, such as Israel; * Entering into standard contracts that have been approved by the European Commission and which provide an adequate level of high quality protection, with the recipients of your Personal Information; * Transferring your Personal Information to organizations that are Privacy Shield Scheme certified, as approved by the European Commission. |

**BY SUBMITTING YOUR PERSONAL INFORMATION THROUGH THE APP, YOU ACKNOWLEDGE, AND AGREE, IN JURISDICTION WHERE SUCH CONSENT IS REQUIRED, TO SUCH TRANSFER, STORING AND/OR PROCESSING OF PERSONAL INFORMATION.**

### **Minors**

The App are intended for Users over the age of sixteen (16). Therefore, Amiad does not intend and does not knowingly collect directly Personal Information from children under the age of sixteen (16) and does not wish to do so. We reserve the right to request proof of age at any stage so that we can verify that minors under the age of sixteen (16) are not using the App.

### **Third Party Service Providers and Third Party Software**

### While using the App we may be using third party service providers, who may collect, store and/or process your information, as detailed in this Privacy Policy.

### Note, that we collect, hold and/or manage your Personal Information through Amiad's authorized third parties vendors of certain products or services (such as hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes.

### Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

### Such third parties service providers include without limitation the following categories of service providers: cloud hosting services.

### **Links to Third Party Sites**

Certain links provided in the App permit Users to leave our App and enter non-Amiad App or services. Most of such linked App and services provide legal documents, including terms of use and Privacy Policy governing the use thereof. It is always advisable to read such documents carefully before using those App and services, *inter alia*, in order to know what kind of information about you is being collected.

### **Security**

### We take appropriate measures to maintain the security and integrity of our App and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures.

### Your Personal Information is hosted on our internal servers, which provide advanced strict security standards (both physical and logical).

### Some of the security measures that we employ include, without limitation: highly secure services design and implementation using state of the art encryption and architectures mechanisms, restriction of access to your Personal Information to individuals who need access to it in order to process it on Amiad’s behalf and implementation of a secured permission management and auditing system using specific and proprietary firewall and network access filtering as well as security group mechanisms.

### Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur.

### Amiad will comply with applicable law in the event of any breach of the security, confidentiality, or integrity of your Personal Information and will inform you of such breach if required by applicable law.

### TO THE EXTENT THAT AMIAD IMPLEMENTED THE REQUIRED SECURITY MEASURES UNDER APPLICABLE LAW, AMIAD SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THE THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION INCLUDED IN THE PERSONAL INFORMATION.

### **Data Retention**

Amiad will retain the Personal Information for as long as we are comfortable that it is accurate and can be relied upon. Personal Information which is no longer required for the purpose for which is was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

### **Changes to the Privacy Policy**

The Company reserves the right to change this Privacy Policy at any time, so please re-visit this page frequently to check for any changes. In case of any material change, we will make reasonable efforts to post a clear notice on the App or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such material changes will take effect seven (7) days after such notice was provided on our App or sent to you via e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated “Last Revised” and your continued use of the App on or after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by the law and without any prior notice.

### **Have any Questions?**

If you have any questions (or comments) concerning this Privacy Policy, please send us an email to the following address: info@amiad.com and we will make an effort to reply within a reasonable timeframe.

\* \* \* \* \*